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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEIS PROPERTIES, LLC

Plaintiff,

08 CV 3911 (CLR)

-against-

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

SHELL OIL COMPANY,

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Nolan E. Shanahan, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Glenn R. Kazlow

GKazlow@ColeSchotz.com

Applicant's Name: Gerard M. Giordano

GGiordano@ColeSchotz.com

Firm Name: Cole, Schotz, Meisel, Forman & Leonard, P.A.

Address: 25 Main Street – Court Plaza North

City/State/Zip: Hackensack, New Jersey 07601

Phone Number: (201) 489-3000

Fax Number: (201) 489-1536

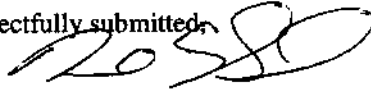
GLENN R. KAZLOW is a member in good standing of the Bar of the State of New Jersey. Mr. Kazlow is also admitted to practice in the United States District Court for the District of New Jersey and Third Circuit Court of Appeals.

GERARD M. GIORDANO is a member in good standing of the Bar of the State of New Jersey. Mr. Giordano is also admitted to practice in the United States District Court for the District of New Jersey.

There are no pending disciplinary proceeding against GLENN R. KAZLOW and GERARD M. GIORDANO in any State or Federal court.

Dated: June 11, 2008
New York, New York

Respectfully submitted,



Sponsor's Name: Nolan E. Shanahan
SDNY Bar (NS-4598)
Firm Name: Cole, Schotz, Meisel, Forman & Leonard, P.A.
Address: 900 Third Avenue, 16th Floor
City/State/Zip: New York, NY 10022-4728
Phone Number: (212) 752-8000
Fax Number: (212) 752-8393

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEIS PROPERTIES, LLC

Plaintiff,

08 CV 3156 (BSJ)

-against-

SHELL OIL COMPANY

Defendants.

**AFFIDAVIT OF
NOLAN E. SHANAHAN
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
)
County of New York) ss:

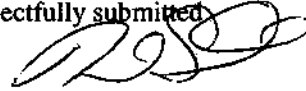
Nolan E. Shanahan, being duly sworn, hereby deposes and says as follows:

1. I am an associate of the law firm of Cole, Schotz, Meisel, Forman & Leonard, P.A., counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Glenn R. Kazlow and Gerard M. Giordano as counsel pro hac vice to represent Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Glenn R. Kazlow since 2006.
4. Glenn R. Kazlow is a partner with Cole, Schotz, Meisel, Forman & Leonard, P.A., New Jersey.
5. I have found Glenn R. Kazlow to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. I have known Gerard M. Giordano since 2006.
7. Gerard M. Giordano is of counsel with Cole, Schotz, Meisel, Forman & Leonard, P.A., New Jersey.
8. I have found Gerard M. Giordano to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
9. Accordingly, I am pleased to move the admission of Glenn R. Kazlow and Gerard M. Giordano, pro hac vice.
10. I respectfully submit a proposed order granting the admission of Glenn R. Kazlow and Gerard M. Giordano, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit of Glenn R. Kazlow and Gerard M. Giordano, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: June 11, 2008
New York, New York

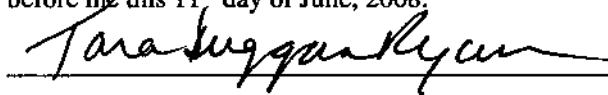
Respectfully submitted,



Name of Movant: Nolan E. Shanahan
SDNY Bar Code: NS-4598

Sworn to and Subscribed

before me this 11th day of June, 2008.



TARA DUGGAN RYAN
NOTARY PUBLIC, State of New York
No. 02RY5034313
Qualified in New York County
Commission Expires October 11, 2011
April